
From: Weiss, Dara (Law) <daweiss@law.nyc.gov>
Sent: Thursday, April 28, 2022 10:39 AM
To: Rob Rickner; remy green
Cc: sierrateam@moskovitzlaw.com; 'Sow-Legal'; 'paynelitigationteam@nyclu.org'; graylegalteam@dwt.com; Hernandez Team; 'AG-NYPDLitigation'; wood@klflaw.com
Subject: RE: [EXTERNAL] Re: Fw: Mullins meet and confer

Counselors,

While attempting to send the email to you as an attachment, I came to realize that the email was never actually sent, which explains why no counsel never received it. I apologize for this error, and am writing to the Court to advise Judge Gorenstein of my misstatement in my April 28, 2022 letter.

Best,
Dara

From: Rob Rickner <rob@ricknerpllc.com>
Sent: Thursday, April 28, 2022 10:16 AM
To: Weiss, Dara (Law) <daweiss@law.nyc.gov>; remy green <remy@femmelaw.com>
Cc: sierrateam@moskovitzlaw.com; 'Sow-Legal' <Sow-Legal@blhny.com>; 'paynelitigationteam@nyclu.org' <paynelitigationteam@nyclu.org>; GrayLegalTeam@dwt.com; Hernandez Team <hernandez@femmelaw.com>; 'AG-NYPDLitigation' <AG.NYPDLitigation@ag.ny.gov>; wood@klflaw.com
Subject: [EXTERNAL] Re: Fw: Mullins meet and confer

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe. Forward suspect email to phish@cyber.nyc.gov as an attachment (Click the More button, then forward as attachment).

Dara,

We have reviewed the PDF and the forwarded email relating to the Mullins meet and confer. We have also engaged an ESI forensics expert to examine those electronic documents. There are material, unexplained discrepancies between the two. And none of the attorneys the email was purportedly sent to received it. As a result, we have serious questions as to whether this email was ever sent at all.

Please send us the email, as an attachment, not a forward, with the original email header and all metadata intact. Forwarding the email, or turning it into a PDF, removes this important information. This is our third request for this email, in this format. If you do not know how to do this yourself, please have someone from your technical support staff assist you.

If we do not receive this email from you by 4pm today, we will bring the matter to the Court.

Thank you,

Rob Rickner

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Rob Rickner (he/him)

rob@ricknerpllc.com

www.ricknerpllc.com

212-300-6506

On Wed, Apr 27, 2022, at 3:13 PM, Weiss, Dara (Law) wrote:

Rob, Remy,

The PDF I sent earlier was in fact created today, from the below email.

Best,

Dara

From: Weiss, Dara (Law) <daweiss@law.nyc.gov>

Sent: Thursday, March 24, 2022 6:15 PM

To: Rob Rickner <rob@ricknerpllc.com>; 'AG-NYPDLitigation'

<AG.NYPDLitigation@ag.ny.gov>; Hernandez Team <hernandez@femmelaw.com>;

GrayLegalTeam@dwt.com <GrayLegalTeam@dwt.com> 'Sow-Legal' <Sow-Legal@blhny.com>;

sierrateam@moskovitzlaw.com <sierrateam@moskovitzlaw.com>; wood@klflaw.com

<wood@klflaw.com>; paynelitigationteam@nyclu.org' <paynelitigationteam@nyclu.org>

Subject: Mullins meet and confer

Counselors:

We are available to meet and confer on this issue tomorrow at 10am

Best,

Dara

Dara L. Weiss

Senior Counsel

New York City Law Department

Special Federal Litigation

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(212) 356-3509 (fax)

Daweiss@law.nyc.gov